

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

JIM COOPER CONSTRUCTION
COMPANY, INC.,

Plaintiff,

V.

C. FORD ELECTRIC, LLC,

Defendant.

CASE NO. CIV-23-691-D

MOTION FOR ENTRY OF DEFAULT BY COURT CLERK

Pursuant to Federal Rules of Civil Procedure 55(a), Plaintiff Jim Cooper Construction Company, Inc. (“Jim Cooper”) requests that the Clerk of the Court enter default in its favor and against Defendant C. Ford Electric, LLC in the sum of \$71,500.00. Jim Cooper provides the following in support of this motion:

1. Jim Cooper commenced this civil action on August 7, 2023. ECF No. 1
2. It then caused a summons in a civil action to be issued addressed to Defendant. The summons was duly served upon Defendant on August 22, 2023. ECF No. 5.
3. The Summons advised Defendant that a default would be entered against it for the full amount demanded by Jim Cooper in its Complaint if no responsive pleading was filed within 21 days after service thereof.
4. The resultant deadline was September 12, 2023.
5. Defendant has not filed a responsive pleading as of the date of this Motion.

6. The Affidavit of Lee Strickland confirms the amount due and owing by Defendant to Jim Cooper is the sum of \$71,500.00. *See Affidavit of Lee Strickland*, attached hereto as Exhibit 1.

7. Pursuant to LCvR 55.1, a second affidavit regarding the Servicemembers Civil Relief Act is also attached. *See Servicemembers Civil Relief Act Affidavit*, attached hereto as Exhibit 2.

WHEREFORE, premises considered Jim Cooper Construction Company, Inc. requests entry of judgment by default in its favor and against Defendant in the sum of \$71,500.00.

Respectfully submitted,

s/ Kaylee Davis-Maddy
Doerner, Saunders, Daniel & Anderson, L.L.P.
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Oklahoma City, OK 73102
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Attorneys for Plaintiff
Jim Cooper Construction Company, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 2nd, 2023, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing.

And also via the United States Postal Service to the following, who is not a registered participant of the ECF System:

C. Ford Electric, LLC
c/o Cory Green
6209 SE 74th St.
Oklahoma City, OK 73135

s/ Kaylee Davis-Maddy
Kaylee P. Davis-Maddy

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